

THE SOUTHWESTERN WATER CONSERVATION DISTRICT

Developing and Conserving the Waters in the SAN JUAN AND DOLORES RIVERS AND THEIR TRIBUTARIES

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Submitted via email to: UCBEfficiency@usbr.gov

Wayne Pullan, Regional Director Upper Colorado Basin Bureau of Reclamation 125 South State Street Salt Lake City, UT 84138-1102

Mr. Pullan:

The Southwestern Water Conservation District (SWCD) appreciates the opportunity to submit comments in response to your request for input on Phase 2 water conservation project funding in the Upper Colorado River Basin under the Inflation Reduction Act (IRA).

SWCD was created in 1941 by the Colorado General Assembly (C.R.S. § 37-47-101 et seq.) to lead in the protection, conservation, use, and development of the water resources of the San Juan and Dolores River Basins for the welfare of the SWCD, and safeguard for Colorado all waters to which the state is entitled. SWCD is comprised of all or part of nine counties in southwestern Colorado: Archuleta, Dolores, La Plata, Montezuma, San Juan, San Miguel, and parts of Hinsdale, Mineral, and Montrose. A representative from each of these counties serves on SWCD's nine-member Board of Directors.

Following its statutory mandate, SWCD has assumed a broad strategic role on behalf of its diverse constituents for more than 80 years. SWCD is currently exploring the possibility of developing a Southwestern Colorado Water Conservation Program that will encompass the San Juan and Dolores River basins in Colorado. We intend to collaborate with others located within southwestern Colorado (e.g., Southern Ute Indian Tribe, Ute Mountain Ute Tribe, local water conservancy districts, environmental non-profits and others) in developing this program so that it best reflects the needs of, and opportunities available within, our local communities.

The Southwestern Colorado Water Conservation Program will be designed to help provide funding and other assistance to local water users across southwestern Colorado to implement projects that will mitigate the impacts of drought, provide for long-term (permanent) water conservation savings as well as ensure the economic viability of our local communities. Types of projects that could be implemented include:

- Support that helps the agricultural sector adapt to using less water via upgraded infrastructure, new technologies, and/or crop switching. The need to maintain the economic viability of producers and local communities is important in this.
- Forest management efforts that not only provide for public safety by reducing wildfire risk and protecting drinking water supplies but provide for forests that support ecological health.
- Work with local communities to ensure the education and implementation of municipal water conservation programs.
- Multi-faceted water resource projects that are designed to increase system efficiencies and reliability while, at the same time, achieving important environmental benefits.

We believe this is the very type of program the IRA funds were intended to help support. As you are aware, the IRA is expressly designed to make federal funding available through grants, contracts, or financial assistance agreements "to or with public entities and Indian Tribes." Pub. L. 117-169, § 50233(b).

SWCD is well positioned to provide support to this effort in that we currently operate a small grant program that serves water users across southwest Colorado. SWCD can also contract directly with the federal government to receive federal funding that will expand that program to address the specific needs identified in the IRA. We understand the needs of local water users and can, at times, better serve them than a single statewide or multistate program (such as the System Conservation Pilot Program).

We appreciate the Bureau of Reclamation seeking input on the best use of this Phase 2 funding. To reiterate, SWCD believes that Reclamation should focus the next round of funding on implementing locally developed solutions that support and maintain the needs of local communities. By developing administrative partnerships with entities like SWCD, Reclamation can foster relationships between the federal government and local entities within the Colorado River Basin, and promote an additional means of encouraging cooperation and transparency among water users. Thank you for the opportunity to provide our input on this matter.

Steve Wolff, General Manager

Steven Wolff

cc: SWCD Board of Directors